Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at http://about.jstor.org/participate-jstor/individuals/early-journal-content.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

LICENSE—DELIVERY OF GOODS BY AGENT—INTER-STATE COMMERCE—STATE ET AL V. CALDWELL, 373 S. E. 178 (N. C.)—A license tax was required of all persons selling or delivering picture frames or pictures. This applied to agents who received the pictures and frames from their firm in another State. *Held*, not in violation of the United States Constitution, Art. I, Sec. 8.

The principles governing this case are authoritatively stated in *Robbins* v. *Selby County Taxing District*, 120 U. S. 489. The distinction the Court draws between goods delivered by the foreign firm directly to the consumer and indirectly through the agent seems doubtful.

MASTER AND SERVANT—EIGHT-HOUR DAY LAW—OVERTIME—EXTRA COMPENSATION—GRAY V. HALL, 66 N. Y. Sup. 500.—Chapter 385, Laws of 1870 of New York, enacts the customary eight-hour-per-day law, but permits overtime contracts for compensation. Plaintiff was employed under an agreement to receive a certain sum per day and proportionately for parts of a day. *Held*, work of over eight hours per day did not entitle him to additional compensation.

This seems a close question. Plaintiff, by agreement, was to receive a certain sum per day and proportionately for parts of days; and the statute provides a day to be eight hours, and plaintiff worked in excess of this time. But the Court held that the clause "part of a day" applied only to days on which plaintiff worked less than eight hours, and denied him relief. *McCarthy* v. *Mayor*, 96 N. Y. 1.

HUSBAND AND WIFE—ALIENATING HUSBAND'S AFFECTIONS—WIFE'S RIGHT OF ACTION—BETSER V. BETSER, 58 N. E. 249 (Ill.)—Action by wife for alienation of husband's affections. *Held*, the reason the wife was not allowed to maintain this action at common law was, that she could not sue without joining her husband as plaintiff. The reason of the rule is abrogated by the statute which allows a married woman to sue without joining her husband. Therefore she may maintain the action.

The law on this point is in an unsettled state in the United States. In Connecticut, it is held that a married woman may maintain the action independently of any statute. *Foote* v. *Card*, 58 Conn. 4. In other States it is held, as in the present case, that if a statute allows a married woman to sue alone, she may maintain this action. *Mehrhoff* v. *Mehrhoff*, 26 Fed. Rep. 13; *Logan* v. *Logan*, 77 Ind. 558; *Clow* v. *Chapman*, 125 Mo. 101, 46 Am. St. Rep. 468; *Bennett* v. *Bennett*, 116 N. Y. 584; *Gernerd* v. *Gernerd*, 185 Pa. St. 233, 39 Atl. 884; *Westlake* v. *Westlake*, 34 Ohio St. 621. In Massachusetts it is held that no such action can be maintained unless adultery is alleged. *Houghton* v. *Rice*, 174 Mass. 366, 54 N. E. 843; *Drocker* v. *Drocker*, 98 Fed. Rep. 702. Maine and Wisconsin are the only States which do not allow a wife to maintain this action. *Duffies* v. *Duffies*, 76 Wis. 374; *Morgan* v. *Martin*, 92 Me. 190. See also on this subject, 15 *Am. & Eng. Enc. of Laws* (second ed.) 864.

JURISDICTION—CIRCUIT COURT OF APPEALS—CASE INVOLVING A FEDERAL QUESTION—AMERICAN SUGAR REFINING CO. V. CITY OF NEW ORLEANS, 104 Fed. 2.—Action by the City of New Orleans to recover of the American Sugar Refining Company a license fee. Taken to the Circuit Court of Appeals and dismissed because it presented a case requiring the construction and application of the United States Constitution.